

number ten tantalum place muskogee, oklahoma 74401 (918) 687-6303

August 28, 1991

Mr. David Dillon
Chief, Water Quality Division
Oklahoma Water Resources Board
600 North Harvey Avenue
P.O. Box 150
Oklahoma City, OK 73101-0150

Dear Mr. Dillon:

Fansteel Metals, Inc. (Fansteel) would like to take this opportunity to update you on the activities taking place at our Muskogee, Oklahoma, facility. As of this writing, Fansteel has not received final comments to the Remedial Assessment Work Plan from the Nuclear Regulatory Commission. As a result, full scale remedial assessment activities have not commenced at the site. However, some initial investigation activities have recently been conducted including preliminary sampling and characterization of sludges contained in Ponds Nos. 6, 7, 8 and 9. Results of these activities have indicated that the sludges are not hazardous by definition or characteristic. (See attachment.) Furthermore, investigations conducted around the perimeter of these ponds have determined that no hazardous wastes have been released to the environment.

Fansteel would like to proactively pursue the closure of Ponds Nos. 6, 7, 8 and 9 in accordance with the Oklahoma Water Resources Board's regulations and guidance. Fansteel feels that because these ponds do not contain radioactive or hazardous wastes, they can be closed independently of other waste management units on site. This letter is being submitted for review by the OWRB pursuant to its authority granted by the Oklahoma Pollution Remedies Board and quantified by Title 82, Chapter 9 of the Oklahoma Statutes.

We would appreciate the opportunity to meet with you and your staff to discuss the pond closures and specific agency




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requirements. Fansteel or our consultant, Earth Sciences Consultants, Inc., will be in contact with you within two weeks to schedule a meeting. In the interim, should you have any questions, please do not hesitate to contact me.

Sincerely,



JOHN J. HUNTER
Corp. Mgr., Process Eng. &
Facilities Construction

JJH/bsm

attach.

cc: K. R. Garrity